

GARRICK S. LEW (SBN 61889)
RICHARD G. HULLINGER (SBN 294025)
Law Offices of Garrick S. Lew & Associates
1000 Brannan Street, Suite 488
San Francisco, CA 94103
Telephone: (415) 575-3588
Facsimile: (415) 522-1506
[**gsl@defendergroup.com**](mailto:gsl@defendergroup.com)
[**richardh@defendergroup.com**](mailto:richardh@defendergroup.com)

Attorneys for Defendant
RINN ROEUN

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

RINN ROEUN,

Defendant.

Case No. 14-CR-00196-CRB

**STIPULATION AND [PROPOSED]
ORDER FOR DEFENDANT TO RETAIN
AND USE MP3 PLAYER AND SELECTED
PROTECTED MATERIALS**

THE PARTIES HEREBY STIPULATE AND AGREE that Defendant, RINN ROEUN is permitted to retain an MP3 player containing audio recordings of conversations alleged to have occurred during the period of the charges he is facing and hard copies of selected protected materials associated with the recordings. The materials (identified by their Bates Nos. and/or file names) are as follows:

Recordings:

1. US-80000002/1D298/1D298
2. US-80000002/1D313/0001
3. US-80000002/1D319/0001
4. US-80000002/1D325/Out_... 7073636348_08-28-2013_110535PM
5. US-80000002/1D334/1D334.20131009.1430
6. US-80000002/1D380/0002
7. US-80000002/1D384/0001

1 Hard Copy Documents:

2 1. US-607131-607133

3 2. US-607940-607941

4 3. US-607934-607935

5 4. US-609250-609251

6 5. US-609268-609269

7 6. FD 302: "Measurement of pyrotechnic powder contained in destructive devices." April 28, 2014.

8 Pursuant to the terms of the Protective Order (Dkt. No. 302, ¶ 1), on May 28, 2014, counsel for
 9 Mr. Roeun sent the government a request to, in part allow Mr. Roeun to retain certain discovery materials
 10 in the jail. On June 5, 2014, the government stated that Mr. Roeun would be able to retain the materials
 11 as described in his request if Mr. Roeun and the government reached an agreement concerning further
 12 conditions. On July 31, 2014, counsel for Mr. Roeun and AUSA Waqar Hasib spoke on the telephone
 13 and agreed that Mr. Roeun would be able to retain an MP3 player and hard copies of documents in the
 14 jail.

15 This stipulation does not bind the United States Marshals Service or any jail in which Mr. Roeun
 16 may be housed to accepting its terms. Rather, terms contained herein are merely an agreement between
 17 the government and Mr. Roeun only.

18 SO STIPULATED.

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20 /s/

/s/

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22 RICHARD HULLINGER
 23 Attorney for Defendant
 RINN ROEUN
 Dated: July 31, 2014

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WAQAR HASIB
 Assistant United States Attorney
 Dated: July 31, 2014

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Defendant.

Case No. 14-CR-00196-CRB

[PROPOSED] ORDER

FOR GOOD CAUSE SHOWN, AND WITH THE CONSENT OF THE GOVERNMENT, IT IS
HEREBY ORDERED that defendant,

RINN ROEUN
DOB: 01/16/1984
PFN ULX 575

shall be permitted the use of one or more MP3 players and permitted to retain the following digital
recordings and hard copy documents:

Recordings:

1. US-8000002/1D298/1D298
2. US-8000002/1D313/0001
3. US-8000002/1D319/0001
4. US-8000002/1D325/Out_... 7073636348_08-28-2013_110535PM

1 5. US-8000002/1D334/1D334.20131009.1430

2 6. US-8000002/1D380/0002

3 7. US-8000002/1D384/0001

4 Hard Copy Documents:

5 1. US-607131-607133

6 2. US-607940-607941

7 3. US-607934-607935

8 4. US-609250-609251

9 5. US-609268-609269

10 6. FD 302: "Measurement of pyrotechnic powder contained in destructive devices." April 28, 2014.

11 This Order does not bind the United States Marshals Service or any jail in which Mr. Roeun may
12 be housed to accepting its terms. Rather, terms contained herein are merely an agreement between the
13 government and Mr. Roeun only.

14 IT IS SO ORDERED.

15 DATED:

16 _____
17 The Honorable Charles R. Breyer
United States District Court Judge
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